

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

DATE FILED: 12/01/2005

v.

CRIMINAL NO. 05-622

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"
TONI HARRIS
SHAWNNA GIBBS**

: **VIOLATIONS:**
: **18 U.S.C. § 371 (conspiracy - 1 count)**
: **18 U.S.C. § 471 (manufacturing
counterfeit currency - 1 count)**
: **18 U.S.C. § 472 (possession of counterfeit
currency - 1 count)**
: **18 U.S.C. § 473 (dealing in counterfeit
currency - 7 counts)**
: **Notice of Forfeiture**

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about July, 2005 to on or about October 5, 2005, at various locations in the Eastern District of Pennsylvania, the defendants,

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"
TONI HARRIS, and
SHAWNNA GIBBS**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly possess, pass, utter or publish counterfeit currency with intent to defraud, in violation of Title 18, United States Code, Section 472, and to knowingly buy, sell, exchange, transfer, receive, or deliver counterfeit currency, with intent to defraud, in violation of Title 18, United States Code, Section 473.

MANNER AND MEANS

It was a part of the conspiracy that:

1. Defendant JOHN GILLETTE DAVIS, a/k/a “Jiz,” counterfeited approximately \$17,770 in counterfeit \$20 Federal Reserve Notes and counterfeit \$10 Federal Reserve Notes (“FRNs”) by copying and scanning and printing the images of genuine currency onto paper.
2. After manufacturing the counterfeit currency, defendant JOHN GILLETTE DAVIS, sold, exchanged, transferred and delivered it to defendant TONI HARRIS and others.
3. Defendant TONI HARRIS sold, exchanged, transferred and delivered to defendant SHAWNNA GIBBS and others, the counterfeit currency that she received from defendant JOHN GILLETTE DAVIS. Defendant HARRIS was paid in genuine United States currency for the counterfeit currency and she paid a portion of the genuine currency that she received to defendant DAVIS. Defendant GIBBS arranged to sell, exchange, transfer and deliver the counterfeit currency to others.

OVERT ACTS

In furtherance of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about September 14, 2005, defendant JOHN GILLETTE DAVIS sold, transferred, and delivered approximately \$300 in counterfeit \$20 Federal Reserve Notes for \$100 in genuine currency.

2. On or about September 21, 2005, defendant JOHN GILLETTE DAVIS sold, transferred, and delivered approximately \$300 in counterfeit \$20 Federal Reserve Notes for \$100 in genuine currency.

3. On or about September 23, 2005, defendant SHAWNNA GIBBS sold, transferred and delivered approximately \$40 in counterfeit \$20 Federal Reserve Notes.

4. On or about September 27, 2005, defendant JOHN GILLETTE DAVIS sold, transferred and delivered approximately \$500 in counterfeit \$20 Federal Reserve Notes for \$125 in genuine currency.

5. On or about September 28, 2005, defendant SHAWNNA GIBBS sold, transferred and delivered approximately \$100 in counterfeit \$20 Federal Reserve Notes.

6. On or about September 29, 2005, defendant TONI HARRIS agreed to deliver to SHAWNNA GIBBS \$1,000 in counterfeit currency.

7. On or about September 29, 2005, defendant TONI HARRIS sold, transferred and delivered approximately \$980 in counterfeit \$20 Federal Reserve Notes for \$300 in genuine currency.

8. On or about September 29, 2005, defendant TONI HARRIS paid defendant SHAWNNA GIBBS for arranging the sale of \$980 in counterfeit currency.

9. On or about September 29, 2005, defendant TONI HARRIS agreed to supply the \$20 missing from the September 29, 2005 transaction for \$1,000 in counterfeit currency.

10. On or about October 3, 2005, defendant JOHN GILLETTE DAVIS sold, transferred and delivered approximately \$860 in counterfeit \$20 Federal Reserve Notes for \$300

in genuine currency.

11. On or about October 4, 2005, defendant TONI HARRIS agreed to supply \$10,000 in counterfeit currency for \$3,000 in genuine currency.

12. On or about October 5, 2005, defendant JOHN GILLETTE DAVIS sold, transferred and delivered \$1,060 in counterfeit \$20 Federal Reserve Notes for \$300 in genuine currency.

13. On or about October 5, 2005, defendant JOHN GILLETTE DAVIS possessed \$6,640 in counterfeit \$20 Federal Reserve Notes and \$10 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about July 2005 through on or about October 5, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

with intent to defraud, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$17,770 in counterfeit \$20 Federal Reserve Notes and counterfeit \$10 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$300 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 21, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$300 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$500 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

SHAWNNA GIBBS

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$100 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 29, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**TONI HARRIS, and
SHAWNNA GIBBS**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$980 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT EIGHT

On or about October 3, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$860 in counterfeit \$20 Federal Reserve Notes with the intent that the counterfeit
Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

knowingly sold, transferred, and delivered counterfeit obligations of the United States, that is,
approximately \$1,060 in counterfeit \$20 Federal Reserve Notes with the intent that the
counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

In violation of Title 18, United States Code, Section 473.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2005, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

with intent to defraud, possessed falsely made, forged, and counterfeited obligations of the
United States, that is, approximately \$6,640 in counterfeit \$20 Federal Reserve Notes and \$10
Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

NOTICE OF FORFEITURE

_____As a result of the violations of Title 18, United States Code, Sections 471, 472 and 473, as set forth in Counts One through Five, and Eight through Ten of this indictment, defendant

**JOHN GILLETTE DAVIS,
a/k/a "Jiz,"**

shall forfeit to the United States: (a) Pursuant to Title 18, United States Code, Section 492, any and all counterfeits of any coins or obligations of the United States, and any articles, devices and other things made, possessed and used in these violations, and any material or apparatus used or fitted or intended to be used in the making of such counterfeits, articles, devices and things; and (b) Pursuant to Title 18, United States Code, Section 982(a)(2)(B), any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violations. This property shall include, but not be limited to:

1. Any property used to make, forge, counterfeit and alter any obligation and other security of the United States, including, but not limited to: (a) Hewlett Packard PCS 1315 all-in-one printer, scanner, copier, serial number CN522C31XR; (b) three \$20 Federal Reserve Notes bearing serial numbers EC45916565F, EC45916566F; EC45916567F.

2. Any and all real and/or personal property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violations alleged in Counts One through Seven of this indictment, including but not limited to the following:

(a) \$433.00 in United States Currency.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 492 and 982, and Title 28, United States Code, Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney